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JAMES H. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

In the United States District Court
For The Northern District of Georgia
Atlanta Division

Darryl Wright

Plaintiff

vs

1) IBM and 2) Taco Mac

RICO Primary Defendants

And

) **1:19-CV-5213**

) Civil Action

) Filed Ex PARTE and Under

) Seal

) A Racketeering Influence

) Criminal Organization("RICO")

Civil Action

) Jury Trial Demanded

3) BWI DoubleTree by Hilton, 4) Carnival Cruise Line, 5) Twin Peaks Kennesaw ,Ga, 6) La Quinta Inn Homewood, Al, 7) Capital Jazz Super Cruise Festival, 8) Inner Harbor Baltimore Marriott Hotel, 9) Marriott Woodland Hills, Ca., 10) Marriott Grande Vista, Orlando, FL, 11) Marriott Renaissance Hotel Santo Domingo,

Dominican Republic, 12) Riazor Hotel Santo Domingo, Dominican Republic, 13) Sheraton Hotel Santo Domingo, Dominican Republic, 14) BWI Sheraton Hotel, 15) Four Points Sheraton Hotel Los Angeles, 16) Sheraton Old San Juan Hotel, 17) Sheraton Cancun Resort & Towers, 18) Royal Lahaina, Maui, Hi, 19) Outriggers Waikiki Beach Resort Honolulu, Hi, 20) Aviation Inn, 21) North Las Vegas, NV. , 22) Dugan's Bar and Restaurant, 23) Dave & Buster's Marietta, GA, 24) Doc's bar and restaurant, 25) Isle of Verde Hampton Inn and Suites San Juan, Puerto Rico, 26) Atlanta North Druid Hills Hampton Inn Hotel, 27) BWI Embassy Suites Hotel, 28) Ft Lauderdale Embassy Suites, 29) Palace Hotel San Francisco, 30) The Grill bar and restaurant Austell, Ga, 31) Tropicana Casino Atlantic City, 32) MGM Grand Las Vegas, 33) Tidewater Condos Panama City Beach, 34) Splash Condos Panama City Beach, 35) Hyatt Regency New Orleans, 36) LA Fitness Kennesaw, Ga, 37) Pier Sixty-Six Hotel & Marina Hyatt , Ft Lauder, 38) Nik's Restaurant Marietta, Ga, 39) La'Parilla Dallas Hwy Marietta, Ga and 40) Associated Credit Union Dobbins Air Force Base.

RICO co-conspirators

Motion for Emergency Temporary Restraining Order, Order to Show cause for Preliminary Injunction before and during trial and Other Ancillary Relief.

Plaintiff Pro Se Darryl Wright respectfully moves to an ex parte hearing, pursuant to Title 18, United States Code, Section 1345 and 2521 and Rule 65(b) of the Federal Rules of Civil Procedure, for a Temporary Restraining Order and Order to show cause why a Preliminary Injunction should eventually be Granted, and Other Ancillary Relief. If the court requires additional argument beyond the materials submitted in support of this Motion, plaintiff also request the Court schedule an ex parte hearing on or before November 25, 2019.

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As set forth with the attached draft complaint, defendants and co-conspirators are responsible for a sophisticated Professional Criminal Enterprise(“PCE”) organized and created to deprive plaintiff and family from their constitutional right to a neutral court proceeding with the most competent counsel or representatives to take this RICO action to litigation- fraud on the US justice system and plaintiffs. To do this, they have turned plaintiff’s life into a nightmare and home into a “house of horrors” and an experimental “biological lab.”

3

RICO defendants and co-conspirators, who collectively have limitless funds, set out to tenaciously, criminally and deliberately violate any criminal local, state, federal, or international law required to achieve their corrupt goal of thwarting law suits. Thereby, defendants and co-conspirators are defrauding the US justice system to prevent defendants from being sued by using and hiring a corrupt criminal enterprise in favor of thwarting or delaying lawsuits against

them. PCE will commit any crime, tell any lie, pay any bribe, extort anyone and even use racial profiling as a tool to further their criminal activities.

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As a result, RICO primary defendants and co-conspirators have unleashed a Professional Criminal Enterprise (“PCE”) to prevent plaintiffs from accessing the US justice system in a timely manner using crimes such as Terroristic Threats(threaten to kill and bodily harm) (six in 2018 and nine in 2019), Unlawful 24/7 surveillance both in and out of plaintiff’s home, hotels, cruise ships, resorts and condos, Home invasions, Stalking of plaintiff and family all over the world, Attempted blackmail, Burglary of plaintiff’s home, Criminal Trespassing of plaintiff’s home, Criminal Damage to Property of plaintiff’s home, Unlawful restraints in plaintiff’s own home along with foot torture causing hallucination for periods of time, False imprisonment, Chinese water torture , Assault and Battery, Torture in plaintiff’s home, friend’s homes and hotels, daily drugging in plaintiff’s home and hotels, Sleep Deprivation, Extortion, Bribery, Computer crimes, Hacking of plaintiff’s home networks(ADT cameras and alarms system, Swann camera system, ATT phone and internet network, Comcast phone internet network, DirecTV network, his wife’s employer Anthem’s network), Hacking AT&T’s and Gmail’s email, Hacking of law firm website’s, creating fake lawyer websites with bogus addresses and phone numbers, Hacking Marriott’s and Sheraton’s websites to prevent plaintiff’s from complaining about their persistent criminal behavior, Intercepting calls to lawyers and hotels, Illegal interception of Electronic Communications to anyone, Capturing cell calls out of the air both from home or away, Mail and Wire fraud, Entering automobile or other motor vehicle with intent to commit theft or felony, Robbery,

Criminal Defamation, Intimidation of plaintiff's friends or witnesses and family members, Rampant violation of plaintiff and family privacy rights and bank fraud. PCE wants to the statute of limitations to run out on all these crimes to defraud plaintiff. PCE will go anywhere, commit any crime and tell any lie to satisfy its client's criminal intentions. And with limitless funds, they can sustain this criminal activity indefinitely.

5

Wherever plaintiff goes, plaintiff is being tracked using his own electronics and automobiles by PCE. Those inside and outside networks are also being hacked such as every hotel, condominiums or resort he frequents, FED-EX, Georgia Department of Labor, Atlanta Library system, Cobb County Library system, Kennesaw State University library and Kennesaw State College of Professional Education computer lab.

6

These bold and appalling perpetrators are deliberate lawbreakers who even stalked plaintiff in the Atlanta Federal Richard Russell building on 10/16/2019 while he was there accessing the US Attorney's office on the 6th floor. They also followed him to through the corridors and elevators to the US District Court Clerk's office on the 22nd floor. Later from the Cobb county Vining's library, they hacked the FBI's website to prevent plaintiff from reporting their many crimes with in the federal building. Who does this type of surveillance of an innocent man in a federal building with its extensive security and ubiquitous cameras?

7

To further explain how PCE operates, they have hacked the top 5 Atlanta law firm's websites and intercepted calls to them from plaintiff. And PCE knows most lawyers or firms have some security so if you haven't talked to someone at the firm to schedule an interview, you are not getting in to see a lawyer. The days of walking into a law firm from the street is over. One has to communicate to them first.

8

For 15 years or 28% of plaintiff's life, PCE has suffocated plaintiff and family privacy and their communications to anyone including counsel. This is why plaintiff is here today. Plaintiff and family are desperately ready to stop the nightmares and move on with their lives. Plaintiffs just want a normal life without defendant's and co-conspirator's criminal surveillance and crimes. Plaintiff wants PCE out of his and his family's life forever.

9

Plaintiff has done nothing to justify this egregious criminal behavior. Plaintiff and family do not have a criminal record and have never personally sued anyone. Plaintiff and family do not want to be here but they have no choice but the court system. Collectively, with limitless funds, defendants and co-conspirators believe they won't be caught and believe that they can sustain this criminal enterprise

indefinitely. They have done it for 15 years with an endless revenue stream- their legal businesses.

10

At every stage RICO co-conspirators had a choice. RICO co-conspirators chose sides when they aided and abetted primary defendants with their criminal activities against plaintiff and family. Co-conspirators had two obligations to plaintiff while he was on their premises 1) to keep guest safe from harm, 2) to guard plaintiff's privacy. They failed miserably by every metric measure. They gave PCE unfettered access to plaintiff's rented room beforehand and during his stay allowing plaintiff to be spied on, filmed, tortured and drugged daily. PCE gave some assurances to the RICO co-conspirators that this complaint would never see the US justice system. Plaintiff wonders what that was?

11

No American should feel comfortable with these organized criminals running around in our streets deliberately breaking local, state, federal and international laws for their rich well-healed clients and defrauding the U.S. justice system.

12

To halt this egregious criminal behavior by PCE, plaintiff is asking the US Court to propose a Temporary Restraining Order which commands defendants (PCE employer) and co-conspirators to cease all surveillance of plaintiff and family, cease all criminal activities of plaintiff and refer this complaint to a US attorney's office or FBI for investigation and prosecution of an organized corrupt criminal enterprise designed to perpetrate fraud on the US Justice system.

13

We suspect this service is being sold in the US by law firms to their well-heal corporate clients who can afford to pay daily, weekly, monthly and yearly expenses to sustain the cost of 24/7 unlawful surveillance of innocent plaintiffs using organize crime activities. Surveillance has been used to plan, plot and commit crimes and deprive plaintiffs their right to competent counsel to litigate legal disputes- fraud on the US justice system and plaintiff.

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Plaintiff is asking for the following relief during these proceedings to trial:

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Equitable Remedies

- 1) Immediate TRO to stop all surveillance totally of plaintiff and family with fines of 1 million dollars per violation to be paid to the court within 24 hours of the violation. Fines double after first violation and for each new successive violation. Violations can accumulate per day such as any illegal surveillance of any kind (GPS, any electronic/computer tracking, listening devices or monitoring devices of any electronics/ computer communications), slander or libel of any kind to anyone in or outside plaintiff's house or anywhere in the world to anyone or any place. Invading plaintiff's home or car in anyway will incur a 2 million dollars fine per event to be paid within 24 hours to the court. Plaintiff would like hourly accounting of funds spent by defendants and co-conspirators on this case.**
- 2) Disclosure of all tracking devices or listening or monitoring devices in or outside plaintiff's home along with hidden cameras or listening devices in plaintiff's home, cars, LA Fitness, restaurants or any premises where plaintiff frequents.**
- 3) Disclosure of any torture gadgets anywhere where plaintiff frequents or at home or anywhere in the world.**
- 4) After TRO is fully implemented, Plaintiff will need thirty days to get proper RICO counsel to help prepare this complex complaint for trial litigation.**
- 5) Scheduling of preliminary injunctions (PI) with the same requirements as the TRO but stronger restraints for the defendants and co-conspirators throughout the pre-trial, trial proceedings and post-trial proceedings with more stringent fines for any violations.**

- 6) Disclosure of how defendants and co-conspirators got the equipment into plaintiff's home, his cars, rental cars, hotels, condos, cruise cabins, resorts or casino rooms.**
- 7) Disclosure of who assisted defendants and co-conspirators with installing their equipment in his home (vendors like ADT, ATT, Comcast, DirecTV..etc) and whether impersonators were used for those vendors. When were the equipment installed? Were there any vendors who assisted or were bribe or extorted in assisting them with the installation of the equipment or any cooperating agencies?**
- 8) Plaintiff wants to know the names, addresses, resume, driver's license numbers, passport numbers, time and billing sheets of all lawyer(s) /investigators firm(s) who worked on this case related to plaintiff Darryl Wright and family for the past 15 years. Names of all teams who traveled and stalked plaintiff all over the world. They know plaintiff and family for years but plaintiff do not know them.**
- 9) Disclose how defendants are getting in and out of plaintiff's home without being detected by plaintiff's surveillance systems.**
- 10) All audios, videos and pictures collected by defendants and co-conspirators of plaintiff in and out of his home, of his family in and out of their home, hotel rooms, condos, cruise ships and cabins, casinos and his friend's home or associate's home's or co-conspirators premises or properties. Plaintiff wants the dates, venues, team member names of who videoed and photographed the content and the resume of those who captured the data and who those items were shown to or played for over the years and why they were shown the content.**

- 11) Disclosure of the location of the monitoring site(s) used to monitor and torture plaintiff and his family in his home or anywhere in the world.**
- 12) Disclose any equipment used by defendants or co-conspirators on their premises. What was the equipment used for? Does it detect anything? If so, what did it detect and how many times?**
- 13) Defendants and co-conspirators shall disclose all drugs used on plaintiff to cause excessive urination, nose and eye watering, excessive bowel movements, nerve agents causing skin and face skin to palpitate, drugs causing hallucinations, hypnosis and depression.**
- 14) Have the drugs used on plaintiff and family been tested for long-term use in the body of a human either separately or as a combination? Are any of them a carcinogen either separately or in combination?**
- 15) Disclose what accelerants were used to spike plaintiff cigars. Has the accelerants' been tested as a carcinogen or long-term use?**
- 16) Disclose of any motion-activated devices or automated devices in his home or cars.**
- 17) Disclosure by defendants or representative of what was said to co-conspirators for them to act against their own interests and against the interest of plaintiff and family.**
- 18) Team members' names, address, driver's license number and passport numbers of all who stalked plaintiff in his house and anywhere in the world for the past 15 years. Those who participated in the criminal torment of plaintiff and family.**
- 19) Disclosure of all communications between defendants or co-conspirators or their team's with local, state and federal law enforcement authorities where plaintiff and family were stalked.**

- 20) Defendants and co-conspirators shall collectively fund plaintiff a new house in a new neighborhood with new computers/electronics for him and his family, new cars, new cloths and new furniture for the house before, during and after trial. Defendants and co-conspirators will fund around the clock security for plaintiff and family to insure no harm or unlawful surveillance of plaintiff and family anywhere in the world indefinitely or for the rest of their lives.**
- 21) On 10/16/2019, plaintiff was illegally tracked to and inside of the US Northern district court building at 75 Ted Turner Drive Atlanta, Ga. Plaintiff has sent the US Marshals an evidence preservation letter for the video of the 1st, 5th, 6th, 7th, and 22nd floors for that day. Plaintiff wants to know who the trackers are and who gave them permission to track plaintiff in a federal building.**
- 22) Disclose how PCE knew plaintiff was going to the Federal building on 10/16/2019. Plaintiff told no one.**
- 23) Disclose how plaintiff was tracked without his phone or watch?**
- 24) Disclose communications between PCE and Associated Credit Union(ACU). What did PCE tell ACU about plaintiff? What did ACU disclose about plaintiff? What did ACU do for PCE?**
- 25) Compensatory and punitive damages will be determined after full discovery process is over on defendants and co-conspirators.**
- 26) Judgement in an amount equal to three times the actual damages sustained by RICO, pursuant to 18 U.S.C. 1964.**
- 27) Reasonable attorney's fees, pursuant to 18 U.S.C. 1964.**
- 28) Judgment in an amount equal to three times the actual damages sustained by the RICO statute, pursuant to O.C.G.A. 16-14.**
- 29) Attorneys' fees in the trial and appellate courts and costs of investigation and litigation reasonably incurred, pursuant to O.C.G.A. 16-14-6.**

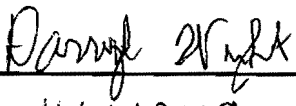
- 30) Appropriate orders judgements prohibiting defendants and co-conspirators from engaging in violations of law alleged herein, pursuant to O.C.G.A. 16-14.
- 31) Judgment in the amount to be proven at trial that requires defendants and co-conspirators to disgorge any unlawful profits or otherwise return the full amount of its unjust enrichment.
- 32) Trial by jury: and
- 33) Such other relief as the Court deems just and proper.

This 17th day of November 2019.

Respectfully submitted,

Plaintiff Darryl Wright

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Date 11/14/2019